

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

VENCO IMTIAZ CONSTUCTION COMPANY,

Plaintiff,

v.

Civil Action No.: 17-mc-00049-JOB

SYMBION POWER LLC

Defendant.

**APPLICATION FOR WRIT OF EXECUTION AGAINST JUDGMENT DEBTOR**

Judgment Creditor, Venco Imtiaz Construction Company (“Venco”) by counsel, requests that the Court issue a writs of execution against Judgment Debtor Symbion Power LLC (“Symbion”). A proposed writ of execution against Symbion is attached hereto as **Exhibit A**. In support of this request Venco states:

1. This matter was initiated on November 11, 2017, with the registration of a judgment rendered in the United States District Court for the District of Columbia (the “Original Action”).
2. The judgment against Symbion is validly registered in this District pursuant to 28 U.S.C. § 1963, and this Court has jurisdiction to enforce such judgments.
3. Rule 69(a)(1) Fed.R.Civ.P. provides: “A money judgment is enforced by a writ of execution, unless the court directs otherwise.”
4. Upon information and belief property of Symbion Power LLC is being held in New Mexico at the law office of Egolf, Ferlic & Harwood.

WHEREFORE, Venco Imtiaz Construction Company respectfully requests entry of a writ of execution against Symbion Power LLC for property within the State of New Mexico in the form set forth in **Exhibit A** attached hereto.

Respectfully submitted,

**MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, PA**

By: /s/ Spencer L. Edelman  
Spencer L. Edelman  
PO Box 2168  
Albuquerque, NM 87103  
505-848-1800

*Attorneys for Judgment Creditor  
Venco Intiaz Construction Company*

WE HEREBY CERTIFY that a true  
and correct copy of the foregoing was  
filed via CM/ECF and served in accordance  
with the Notice of Electronic Filing on  
this 6th day of November, 2017, and emailed to:

Brian Egolf, Esq.  
Egolf Ferlic & Harwood  
123 W. San Francisco St. #200  
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MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By: /s/ Spencer L. Edelman  
Spencer L. Edelman

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